

**EXHIBIT 82
FILED UNDER SEAL**

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

-○○○-

WAYMO LLC,)
)
Plaintiff ,)
)
vs.) Case No: 3:17-cv-00939-WHA
)
)
UBER TECHNOLOGIES, INC.,)
OTTOMOTTO LLC, OTTO TRUCKING,)
LLC,)
)
Defendants.)
)

CONFIDENTIAL - ATTORNEYS' EYES ONLY
VIDEOTAPED DEPOSITION OF DANIEL GRUVER
San Francisco, California
Thursday, April 20, 2017

Reported by

LISA R. TOW

CSR No. 6629

Job No. 2599857

1	A. He was interested in the	09:27:19AM
2	functionality of it in respect to how it	09:27:20AM
3	pertained to the self-driving vehicle.	09:27:25AM
4	Q. Did Anthony Levandowski have input	09:27:29AM
5	into the functionality of Spider?	09:27:33AM
6	A. Yes.	09:27:35AM
7	Q. What other input would Anthony	09:27:35AM
8	Levandowski have had in relation to the	09:27:46AM
9	functionality -- I'm sorry. Let me start	09:27:48AM
10	over again.	09:27:50AM
11	What input did Anthony Levandowski have	09:27:50AM
12	in relation to the design of Spider?	09:27:54AM
13	A. Design review involvement, I	09:27:57AM
14	guess.	09:28:11AM
15	Q. And Anthony Levandowski would	09:28:16AM
16	provide feedback on design; is that fair?	09:28:22AM
17	A. Yeah, as it pertained to schedule	09:28:25AM
18	mostly.	09:28:29AM
19	You know, is given two options or three	09:28:30AM
20	options we would be considering would	09:28:33AM
21	something more expediently get us a system	09:28:33AM
22	to test on a truck or more thoroughly meet	09:28:36AM
23	sort of requirements our software engineers	09:28:39AM
24	wanted.	09:28:42AM
25	Q. But through that input then,	09:28:44AM

1	But, it used two lenses in each of	09:30:28AM
2	eight optical cavities. So I could consider	09:30:32AM
3	that sixteen lenses.	09:30:35AM
4	Q. Did it at any point in the design	09:30:37AM
5	use one lens to both transmit -- let me	09:30:46AM
6	start over again.	09:30:51AM
7	Did the lenses that the Spider design	09:30:52AM
8	use, both transmit and receive light?	09:31:04AM
9	A. Yes.	09:31:06AM
10	Q. And that's true for each of those	09:31:08AM
11	lenses; correct?	09:31:12AM
12	A. Each -- yes. It was a pair of	09:31:13AM
13	lenses in sequence.	09:31:19AM
14	Q. Right. But each -- each of the	09:31:22AM
15	sixteen lenses both transmitted and received	09:31:26AM
16	light?	09:31:31AM
17	A. No. There were eight pairs of	09:31:31AM
18	lenses. The two lenses together formed an	09:31:35AM
19	optical system.	09:31:38AM
20	Q. Who came up with the lens design	09:31:49AM
21	for Spider?	09:32:10AM
22	A. I don't recall.	09:32:11AM
23	Q. Was -- it wasn't you?	09:32:12AM
24	A. No.	09:32:20AM
25	Q. Was it Anthony Levandowski?	09:32:20AM

1 [REDACTED] [REDACTED]

2 [REDACTED] 09:37:22AM

3 Q. And that was around the same time 09:37:22AM

4 that it was publically announced? 09:37:26AM

5 A. Yeah, I think it was exactly the 09:37:28AM

6 same time. 09:37:31AM

7 Q. [REDACTED] [REDACTED]

8 [REDACTED] [REDACTED]

9 [REDACTED] [REDACTED]

10 [REDACTED] [REDACTED]

11 [REDACTED] [REDACTED]

12 [REDACTED] [REDACTED]

13 [REDACTED] [REDACTED]

14 [REDACTED] [REDACTED]

15 [REDACTED] [REDACTED]

16 [REDACTED] [REDACTED]

17 [REDACTED] [REDACTED]

18 Q. The -- going back to Spider. Did 09:38:08AM

19 Spider use eight fiber lasers? 09:38:13AM

20 A. Yes. 09:38:26AM

21 Q. Who came up with the idea to use 09:38:30AM

22 eight fiber lasers? 09:38:34AM

23 A. A combination of engineers. 09:38:35AM

24 Q. Can you name any specific people 09:38:37AM

25 that you are aware of that were involved in 09:38:39AM

1	been involved in a design review for Fuji?	09:48:39AM
2	A. I wouldn't say "never."	09:48:42AM
3	Q. When has he been involved?	09:48:43AM
4	Let me start over again.	09:48:47AM
5	Mr. Levan -- Anthony Levandowski --	09:48:49AM
6	Has Anthony Levandowski been involved	09:48:54AM
7	in any design reviews for Fuji?	09:49:05AM
8	A. I can't recall a date, but he's	09:49:09AM
9	been involved.	09:49:20AM
10	Q. Can you -- how many design reviews	09:49:22AM
11	of Fuji have there been?	09:49:32AM
12	A. So we -- we meet frequently about	09:49:35AM
13	the progress of it with either engineering	09:49:42AM
14	leads or our entire team. So, I would say	09:49:45AM
15	we meet twice a week to do status updates or	09:49:47AM
16	project updates. So, lots.	09:49:51AM
17	Q. And you can't recall specific	09:49:54AM
18	dates, but Anthony Levandowski has been	09:49:57AM
19	involved in at least some of those design	09:49:59AM
20	reviews; is that fair?	09:50:02AM
21	A. Yeah. He's been -- there's been	09:50:03AM
22	updates to him and other people about	09:50:08AM
23	progress. I don't think we've setup formal	09:50:10AM
24	design reviews that have involved him sort	09:50:14AM
25	of being involved in a design review, but I	09:50:16AM

1	have happened, but I --	10:50:17AM
2	Q. What was Anthony Levandowski's	10:50:20AM
3	role in the decision to pivot from Spider to	10:50:23AM
4	Fuji?	10:50:27AM
5	A. He had the opportunity to veto a	10:50:28AM
6	design change. But didn't. So, I guess --	10:50:34AM
7	Q. But ultimately the decision as to	10:50:42AM
8	whether to pivot from Spider to Fuji would	10:50:44AM
9	have been up to Anthony Levandowski; fair?	10:50:49AM
10	A. Yes.	10:50:55AM
11	Q. Fair.	10:50:55AM
12	And was Spider designed to rotate about	10:50:58AM
13	in access?	10:51:05AM
14	A. Yes.	10:51:06AM
15	Q. Did the outgoing laser beams go	10:51:06AM
16	through a hole in a mirrored surface in	10:51:10AM
17	Spider?	10:51:13AM
18	A. Yes.	10:51:13AM
19	Q. Did the incoming reflected light	10:51:15AM
20	bounce off that mirrored surface on it's way	10:51:19AM
21	to the received block in Spider?	10:51:23AM
22	A. Yes.	10:51:24AM
23	Q. Would light transmit out and	10:51:29AM
24	return through the same lens pair in Spider?	10:51:32AM
25	A. So, we prototyped a handful of --	10:51:36AM

1	discussed a handful of designs. I'm trying	10:51:48AM
2	to remember which one was the last plan of	10:51:51AM
3	record. But, I believe the sort of last	10:51:53AM
4	plan of record had that.	10:51:56AM
5	Q. And did Spider use more than one	10:51:58AM
6	laser?	10:52:01AM
7	A. Clarify.	10:52:06AM
8	Q. Did Spider have available to it	10:52:07AM
9	the use of more than one laser?	10:52:12AM
10	A. Yes.	10:52:14AM
11	Q. And did the received block in	10:52:14AM
12	Spider use more than one receiver?	10:52:18AM
13	A. Yes.	10:52:21AM
14	Q. Did the light going out -- let me	10:52:22AM
15	start over again.	10:52:26AM
16	When the light went out in Spider would	10:52:28AM
17	it partially overlap with the path of light	10:52:34AM
18	returning to the received block?	10:52:39AM
19	A. Yes.	10:52:41AM
20	Q. And was -- were the lenses in	10:52:55AM
21	Spider were they in a housing of some kind?	10:53:09AM
22	A. Yes.	10:53:12AM
23	Q. Why don't we go off the record.	10:53:12AM
24	THE VIDEOGRAPHER: Off the record at	10:53:19AM
25	10:50 a.m.	10:53:24AM